

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)
) Chapter 11
)
SORRENTO THERAPEUTICS, INC., <i>et al.</i> ¹) Case No. 23-90085 (CML)
)
Debtors.) (Jointly Administered)
)
)

**RESPONSE OF NANTWORKS LLC AND DR. PATRICK SOON-SHIONG
TO MOTIONS TO TRANSFER VENUE OR DISMISS**

NantWorks LLC and Dr. Patrick Soon-Shiong submit this response to the (a) *Party In Interest, Timothy Culberson's, Motion To Dismiss Or Transfer Venue Pursuant To Rule 1014(A)(2) Due To Fraudulent Venue Selection By Debtors' Counsel And Motion For Reconsideration Of Motion To Compel Discovery From Latham & Watkins, LLP With Redactions* (ECF No. 1851) and (b) *United States Trustee's Motion To Transfer Venue Or Dismiss Pursuant To 28 U.S.C. § 1408 And Fed. R. Bankr. P. 1014(A)(2)* (ECF No. 1879) (collectively, the “Venue Motions”).

NantWorks and Dr. Soon-Shiong take no position on whether the Venue Motions should be granted.² They file this response, however, to make clear that granting the substantive relief requested in the Venue Motions should not vacate or otherwise affect prior orders that this Court

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Sorrento Therapeutics, Inc. (4842) (“Sorrento”) and Scintilla Pharmaceuticals, Inc. (7956) (“Scintilla” and together with Sorrento, the “Debtors”). The Debtors' service address is: 9380 Judicial Drive, San Diego, CA 92121.

² Although, it is notable that all of the principals and most of the advisors in these cases are located in or between San Diego, California and Los Angeles, California. The Houston venue added substantial costs and expenses for all major parties compared with the cost of a case properly filed in the Southern District of California.

has entered during the cases. NantWorks and Dr. Soon-Shiong are parties to a settlement with the Debtors and multiple other parties approved by this Court on August 14, 2023 that was the result of extensive efforts and costs.³ Vacating that order will cause unnecessary litigation and expense, the avoidance of which was a central purpose of the settlement.

Accordingly, NantWorks and Dr. Soon-Shiong request that to the extent the Court grant substantive relief under either or both of the Venue Motions, any such order should provide that prior orders entered by the Court shall remain valid and effective notwithstanding either transfer or dismissal of the Debtors' cases.

Dated: February 27, 2024
Houston, Texas

Respectfully submitted,

/s/ Paul M. Green
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*Counsel to NantWorks, LLC and
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CERTIFICATE OF SERVICE

I certify that on February 27, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Paul M. Green
Paul M. Green

³ See, *Order Approving And Implementing Mediation Settlement And Granting Related Relief* (ECF No. 1205).